

EXHIBIT H

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE)
ANTITRUST LITIGATION)
) No. 11-CV-2509-LHK
THIS DOCUMENT RELATES TO:)
ALL ACTIONS.)

VIDEO DEPOSITION OF PATRICIA MURRAY
February 14, 2013

Reported by: Anne Torreano, CSR No. 10520

1 the low end, 2 to 5 below expectations or improvement
2 required. Those are guidelines to consider so that
3 there is a distribution among employees.

4 We're an engineering company. We measure
02:33:49 5 everything.

6 Q. Well, that's why I asked about the
7 quantification of the statistical stuff about the
8 salary.

9 MR. PICKETT: Is there a question pending?

02:33:56 10 MR. SAVERI: There is no question pending. I
11 think that's a fair comment.

12 BY MR. SAVERI:

13 Q. Did Intel track attrition rates?

14 A. Yes.

02:34:27 15 You mean people leaving --

16 Q. Yeah.

17 A. -- Intel? Yes, we did. Yes, we do.

18 Q. Were or are attrition rates built into the
19 labor compensation budget?

02:34:46 20 A. I'm not sure I understand what that means. I
21 understand your words, but I don't understand how to
22 answer the question.

23 Q. Well, let me -- let me -- let me go at it this
24 way: As a general matter, did Intel or does Intel
02:35:19 25 understand that its -- that attrition is costly to

1 Intel?

2 A. Attrition is costly to any company, yes.

3 Q. In what way?

4 A. Well, in that --

02:35:35 5 Q. Let's just talk about Intel. Based on your
6 experience at Intel, how was it costly to Intel?

7 A. One, you lose people who are valuable to you
8 and you've invested in, who know the company and know
9 its values. You have to spend money hiring to replace
02:35:52 10 them and then training to replace them.

11 Q. And again, is it fair to say that from time to
12 time people left Intel because they -- at least they
13 believed they had a better job offer somewhere else?

14 A. I'm certain I could speculate that that's
02:36:14 15 true. HR professional literature will tell you that
16 people cite compensation as a reason to leave because
17 it is an easy thing to say and it doesn't offend their
18 manager. It isn't generally the reason they leave.

■ ■ [REDACTED]

[REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

[REDACTED] ■ [REDACTED]

16 Q. I think you used an example of a factory
17 abroad. Am I recalling that --

18 A. I actually wasn't talking about a factory.
19 I'd said Costa Rica, but I didn't mean a factory.

02:38:54 20 There are a lot of functions -- job functions
21 in Costa Rica that might be competitive, for example,
22 with other back-office facilities. And my example was
23 that the labor market changes if another company moves
24 into that country. So that changes your external
02:39:11 25 review of circumstances.

02:39:26

02:40:16

Category	Value
Category 1	100
Category 2	200
Category 3	300
Category 4	400
Category 5	500
Category 6	600
Category 7	700
Category 8	800
Category 9	900
Category 10	1000

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I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing proceeding and caption named or in any way interested in the outcome of the cause in said caption.

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In witness whereof, I have subscribed my name this 25th day of February, 2013.

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☒ Reading and Signing was not requested.

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